

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICK KELLER and NITISH LAL, on	)	
behalf of Plaintiffs and a class,	)	
	)	
Plaintiffs,	)	
	)	Case No. 2021-cv-_____
vs.	)	
	)	
NORTHSTAR LOCATION SERVICES,	)	
LLC,	)	
	)	
Defendant.	)	

**DEFENDANT’S NOTICE OF REMOVAL**

Defendant Northstar Location Services, LLC (“Northstar”), by its attorneys, Gordon Rees Scully Mansukhani, LLP, pursuant to 28 U.S.C. §§ 1331, 1441, 1446, and 1453 hereby submits its Notice of Removal of the action styled *Patrick Keller and Nitish Lal, on behalf of Plaintiffs and a class v. Northstar Location Services, LLC*, Case Number 2021-CH-02463, from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois, Eastern Division. In support hereof, Northstar states as follows:

**I. THE STATE COURT ACTION**

1. On May 20, 2021, Plaintiff commenced an action in the Circuit Court of Cook County, Illinois, styled *Patrick Keller and Nitish Lal, on behalf of Plaintiffs and a class v. Northstar Location Services, LLC*, Case Number 2021-CH-02463. Plaintiffs’ Complaint (“Compl.”), is attached hereto as Exhibit A.

2. Northstar first received notice of this lawsuit on or about May 24, 2021, when its registered agent was served with a copy of Plaintiffs’ Summons and Complaint.

3. Plaintiffs' Complaint alleges that Northstar violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA") by using a "letter vendor" to mail correspondences to Plaintiffs. (Compl. ¶¶ 15-21.) Plaintiffs allege that use of a letter vendor is an unauthorized disclosure of information to a third-party and an "unfair means in connection with collection of a debt." (Compl. ¶¶ 33-34.)

4. Plaintiffs purports to bring this lawsuit on behalf of herself and on behalf of a class defined as follows:

(a) all individuals in Illinois (b) with respect to whom Defendant had a letter prepared and sent by a letter vendor (c) which letter was sent at any time during a period beginning one year prior to the filing of this action and ending 30 days after the filing of this action.

(Compl. ¶ 36.)

5. Plaintiff alleges that "there are more than 40 members of the class, and the class is so numerous that joinder of all members is not practicable." (Compl. ¶ 38.)

6. Plaintiff seeks to recover "statutory damages" (up to \$1,000 per alleged violation pursuant to 15 U.S.C. § 1692k(a)(2)(B)), attorneys' fees, and other litigation expenses. (Compl. at 6 (prayer for relief))

## **II. THE PROCEDURAL REQUIREMENTS FOR REMOVAL ARE SATISFIED**

7. Northstar first received notice of this lawsuit on May 24, 2021, when its registered agent was served with a copy of Plaintiffs' Summons and Complaint. USB's instant notice of removal is timely under 28 U.S.C. § 1446(b) because it is filed within thirty (30) days of service.

8. Northstar is the sole Defendant in this action. There is no need to obtain the consent of any other Defendants to the removal of this action under 28 U.S.C. § 1453(b)

9. This Court encompasses the locality in which the state court action is now pending, making this Court a proper forum pursuant to 28 U.S.C. § 1441(a).

10. No previous application has been made for the relief requested herein.

11. Pursuant to 28 U.S.C. § 1446(d), Northstar will serve Plaintiff with a copy of this Notice of Removal and file a copy with the Circuit Court of Cook County, Illinois.

**III. THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION, HAS FEDERAL QUESTION JURISDICTION**

12. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 and may be removed to this Court pursuant to 28 U.S.C. §§ 1441, 1446, and 1453.

13. Specifically, this Court has jurisdiction over this case pursuant to 28 U.S.C. § 1453(b) because it is a civil action that “arising under the Constitution, laws, or treaties of the United States” under 28 U.S.C. § 1331, namely the FDCPA.

14. Pursuant to 28 U.S.C. § 1446(a), copies of all summons, process, pleadings, motions, and orders filed in the State Court Action are encompassed by Exhibits A-C.

15. Prior to removal, Northstar’s counsel attempted to confer with Plaintiffs’ counsel regarding its position on removal. Plaintiffs’ counsel did not respond to that correspondence.

16. If any question arises regarding the propriety of the removal of this action, Northstar respectfully requests the opportunity to present a brief and/or oral argument in support of its position that this case is removable.

WHEREFORE, Defendant Northstar Location Services LLC hereby removes the action now pending against it in the Circuit Court of Cook County, Illinois, and requests that the United States District Court for the Northern District of Illinois, Eastern Division, assume and retain full jurisdiction over this action for all further proceedings.

Dated: June 23, 2021

Respectfully submitted,

By: /s/ Chirag H. Patel

Chirag H. Patel, # 6306711

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*Attorneys for Defendant Northstar Location  
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**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn upon oath deposes and states that he served a copy of the foregoing document by emailing a true and correct copy, on June 23, 2021.

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